

Supporting Statement for a Request for OMB Review under The Paperwork Reduction Act

1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: TSCA Sections 402 and Section 404 Training, Certification, Accreditation and Standards for Lead-Based Paint Activities and Renovation, Repair, and Painting

EPA ICR No.: 1715.13 OMB Control No: 2070-0155

1(b) Short Characterization

This information collection request (ICR) combines existing ICRs 1715.09 (ICR for lead-based paint activities), 1715.10 (ICR addendum for the 2008 RRP final rule), and 1715.12 (ICR for the 2010 RRP opt-out and recordkeeping final rule)¹ covering the reporting and recordkeeping requirements for individuals or firms conducting lead-based paint activities or renovation in or on houses, apartments, or child-occupied facilities built before 1978, under the authority of sections 402 and 404 of the Toxic Substances Control Act (TSCA) (15 U. S. C. 2682, 2684; see Attachment 1).

Sections 402(a) and 402(c)(3) of TSCA require EPA to develop and administer a training and certification program as well as work practice standards for persons who perform lead-based paint activities and/or renovations. The current regulations in 40 CFR part 745, subpart E, cover work practice standards, recordkeeping and reporting requirements, individual and firm certification, and enforcement for renovations done in target housing or child-occupied facilities. The current regulations in 40 CFR part 745, subpart L, cover inspections, lead hazard screens, risk assessments, and abatement activities (referred to as “lead-based paint activities”) done in target housing and child-occupied facilities. Section 401 of TSCA defines target housing as any housing constructed before 1978 except housing for the elderly or disabled or 0-bedroom dwellings.

Sections 402(a) and 402(c)(3) of TSCA require reporting and/or recordkeeping from four entities: firms engaged in lead-based paint activities or renovations in target housing and child-occupied facilities; individuals who perform lead-based paint activities in target housing and child-occupied facilities; training providers; and states/territories/tribes/Alaskan native villages (hereafter, the term “states” includes territories/tribes/villages). The following sections provide a general overview for each entity:

Firms: Firms that wish to engage in renovations or lead-based paint activities in target housing or child-occupied facilities must obtain certification from EPA/states. This includes firms consisting only of one self-employed individual. To receive certification, a firm must

¹ EPA ICR No. 1715.11 was the ICR addendum for the opt-out and recordkeeping *proposed* rule, and was superseded by the ICR addendum for the *final* rule.

submit a letter to EPA/states certifying that it will employ certified individuals and conduct work in target housing and child-occupied facilities in accordance with the applicable work practice standards. Renovation, repair, and painting firms must apply for re-certification every five years, while firms performing lead-based paint activities must apply for re-certification every three years. The rule also requires firms to develop and retain records of the lead-based paint activities and renovations they undertake to demonstrate compliance with standards and provide a written record for future reference. Firms must notify the Agency prior to commencement of lead-based paint abatement activities. In addition, for work in child-occupied facilities located in public or commercial buildings, the rule requires firms to provide the building owner and adult representative of the child-occupied facility with a lead hazard information pamphlet. (Existing regulations require the distribution of a lead hazard pamphlet, and the associated recordkeeping, before renovations in all target housing. This burden is reflected in EPA ICR No. 1669.05 *Lead-Based Paint Pre-Renovation Information Dissemination- TSCA Sec. 406(b)*, and is approved under OMB Control No. 2070-0158.) These notification, reporting, and recordkeeping requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections.

Individuals: Individuals who wish to perform lead-based paint activities in target housing or child-occupied facilities must also receive certification from EPA/states. To obtain certification, an individual must complete an accredited training course and receive a course completion certificate, pass a third-party certification exam, meet specific education/experience requirements, and demonstrate this to EPA/states.

Individuals certified to perform lead-based paint activities must take a refresher course and apply for re-certification every three years (five for individuals who have passed a proficiency test as part of their training). The rule also requires individuals to develop records of the lead-based paint activities and renovations they undertake to demonstrate compliance with standards and provide a written record for future reference. These notification and recordkeeping requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections.

Training providers: Training programs seeking to offer training for inspectors, risk assessors, project designers, abatement supervisors, abatement workers, renovators or dust sampling technicians must obtain EPA/state accreditation. In order for EPA/states to have the information necessary to evaluate and accredit the training programs, training providers must prepare and submit application packages. Training programs also must maintain records related to their students and training personnel qualifications. Training programs are required to notify the Agency prior to (i) prior to providing training courses, and (ii) following completion of training courses. Training programs must apply for re-accreditation every four years. These notification requirements are necessary to provide EPA compliance monitoring and enforcement personnel with information necessary to track compliance activity and to prioritize inspections.

States: Under TSCA section 404, EPA must review and assess state submissions to determine whether to grant authorization to administer a program addressing training, certification, accreditation and standards for lead-based paint activities or renovation, repair, and

painting. A state seeking authorization will need to provide information to EPA so the Agency may determine whether its program is at least as protective of human health and the environment as the federal program and whether it provides adequate enforcement. Authorized states need to provide a report to EPA on their activities.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Under section 402(a)(1) of TSCA, the Agency must “...promulgate final regulations governing lead-based paint activities to ensure that individuals engaged in such activities are properly trained; that training programs are accredited; and that contractors engaged in such activities are certified. Such regulations shall contain standards for performing lead-based paint activities, taking into account reliability, effectiveness and safety.”

Section 402(a)(2) states that “Final regulations promulgated under [section 402(a)] paragraph (1) shall contain specific requirements for the accreditation of ... training programs ... including, but not limited to:

- Minimum requirements for the accreditation of training providers;
- Minimum training curricula requirements;
- Minimum training hour requirements;
- Minimum hands-on training requirements;
- Minimum training competency and proficiency requirements;
- Minimum requirements for training program quality.

Section 402(c)(3) directs EPA to revise its regulations under TSCA section 402(a) to apply to renovation and remodeling activities that create lead-based paint hazards.

Section 404(a) of TSCA states that “[a]ny State which seeks to administer and enforce the standards, regulations, or other requirements established under Section 402 may...develop and submit to the Administrator an application, in such form as the Administrator shall require, for authorization of such a State program.” The Agency shall approve such an application, if it finds that “...the State program is at least as protective of human health and the environment as the Federal program under section 402...and such State program provides adequate enforcement.” The statute also requires the Agency to implement the program in states that do not receive authorization.

Section 407 of TSCA states that regulations shall include such recordkeeping and reporting requirements as may be necessary to ensure effective implementation.

2(b) Practical Utility/Users of the Data

Public or commercial building owners, child-occupied facility operators, and parents/guardians

The owner of a public or commercial building containing a child-occupied facility must be provided with a lead hazard information pamphlet before any renovation in the child-occupied facility commences. In addition, if the child-occupied facility is not operated by the owner of the building, an adult representative of the child-occupied facility must also be provided with a lead hazard information pamphlet. Parents and guardians of children using child-occupied facilities must be provided with general information on the renovation as well as the pamphlet, or information on how to obtain a copy of the pamphlet. Information contained in this pamphlet may be used by homeowners, public or commercial building owners, child-occupied facility operators, and parents or guardians to take appropriate precautions to minimize the exposure of children to lead-based paint hazards created by renovations. Parents and guardians may also use general information about the renovation for the purpose of minimizing the exposure of their children to lead-based paint hazards created by renovations.

EPA

This information collection will provide EPA with materials necessary to authorize state renovation and training rule programs and to serve as the accrediting and certifying body in states without authorized programs (discussed further below).

EPA/States

This collection will enable EPA/states to determine compliance with and enforce the requirements for training, certification, accreditation, and work practice standards for renovations and lead-based paint activities. Without this collection, there would be no meaningful way of ensuring the implementation of the statutory objective: to ensure that trained individuals conduct renovations and lead-based paint activities in such a way as to minimize potential harm to occupants. The rule provides flexibility for individuals conducting renovations and lead-based paint activities, by relying on guidance and training to help individuals determine the best approaches for renovations and lead-based paint activities. The Agency believes this is the best method for accommodating a variety of projects and site-specific conditions.

It is the nature of certification and accreditation that an entity seeking such must provide materials to the certifying or accrediting body. The materials the Agency/state requires for these activities are central to the activity. In addition, EPA will be relying on training provider notifications to keep track of which individuals have received accredited renovator training. This information will be a critical part of EPA's compliance monitoring and enforcement activities.

The re-certification and re-accreditation requirements for individuals and training programs are meant to ensure that training programs incorporate new developments and technologies in their courses and provide training to individuals. The Agency believes this will ensure that individuals and firms conduct renovations and lead-based paint activities in the safest and most effective manner possible.

The records individuals and firms would have to compile and retain are necessary as a reference for building owners/occupants, EPA or authorized entities. The records would demonstrate that the activities are done in a safe and effective manner, according to the minimum

work practice standards established by the rules. These recordkeeping requirements are also necessary to permit the Agency to target its enforcement activities and to ensure compliance within the contracting and training community.

3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

The Agency's collection pursuant to the TSCA 402/404 regulations does not duplicate any other collection. There is no other model program for lead-based paint activities or renovations and there are currently no other federal requirements for the training and certification of individuals engaged in these activities, or lead hazard information distribution requirements for renovations in child-occupied facilities.

3(b) Public Notice Required Prior to ICR Submission to OMB

Prior to submission to OMB, this ICR will be made available to the public for comment through a Federal Register notice. The public will have 60 days to provide comments. Any comments received will be given consideration when completing the supporting statement that is submitted to OMB.

3(c) Consultations and Public Comments

Under 5 CFR 1320.8(d)(1) OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an original or renewal ICR to OMB for review and approval. In accordance with this regulation, EPA will pursue additional consultations with interested parties during the development of the renewal of this collection.

3(d) Effects of Less Frequent Collection

Due to the nature of this regulation and its collection, less frequent collection is not feasible. In particular, each individual and firm must obtain certification and re-certification, each training program must obtain accreditation and re-accreditation as well as specific notification and documentation prior to commencement and upon completion of each lead-based paint activity and renovation course, and each lead-based paint activity is a separate and unique event requiring specific notification and documentation. Program approval for states is a one-time activity, although there is ongoing reporting.

3(e) General Guidelines

This ICR is consistent with OMB's general guidelines. The Agency requires that individuals and firms maintain records for three years. Authorized states report once a year for the first three years and biannually thereafter.

The training providers should maintain student records as long as the individual is certified following training for a period of three and a half years. This is due to the interim certification period of six months following an individual completing lead-based paint activities training, which allows the individual time to apply to EPA/states to receive official certification. At such time, the individual remains certified for three years before he or she must obtain refresher training and re-certification. EPA wishes training providers to maintain records on a particular lead-based paint activities trainee for as long as the individual is certified following training, so three and one-half years is an appropriate period for the retention of such records. It is likely that most training providers that seek accreditation to offer renovator or dust sampling technician courses will already be accredited to offer lead-based paint activities courses. The Agency believes that a single recordkeeping period for these providers is simpler and easier to administer.

3(f) Confidentiality

This information collection does not include questions of a confidential nature.

3(g) Sensitive Questions

This information collection does not include questions of a sensitive nature.

4. THE RESPONDENTS AND INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

Respondents to the lead-based paint activities rule include:

- 1) firms and individuals engaged in lead-based paint activities
- 2) training programs providing training services in lead-based paint activities
- 3) state programs

Respondents to the renovation, repair, and painting rule include:

- 1) firms and individuals engaged in residential renovations or renovations in child-occupied facilities
- 2) training programs providing training services in renovations
- 3) state programs

The North American Industrial Classification System (NAICS) codes associated with industries most likely affected by the paperwork requirements are described below:

- 23321 Single Family Housing Construction
- 23331 Manufacturing and Industrial Building Construction
- 23332 Commercial and Institutional Building Construction
- 23521 Painting and Wall Covering Contractors
- 23542 Drywall, Plastering, Acoustical, and Insulation Contractors
- 23551 Carpentry Contractors
- 23561 Roofing, Siding, and Sheet Metal Contractors
- 23594 Wrecking and Demolition Contractors
- 23599 All Other Special Trade Contractors
- 236118 Residential Remodelers
- 238210 Electrical Contractors
- 238220 Plumbing, Heating, and Air-Conditioning Contractors
- 238320 Painting and Wall Covering Contractors
- 238350 Finish Carpentry Contractors
- 238310 Drywall and Insulation Contractors
- 238170 Siding Contractors
- 238340 Tile and Terrazzo Contractors
- 238150 Glass and Glazing Contractors
- 238390 Other Building Finishing Contractors
- 238290 Other Building Equipment Contractors
- 531110 Lessors of Residential Buildings and Dwellings
- 531311 Residential Property Managers
- 541330 Engineering Services
- 541350 Building Inspection Services
- 611110 Elementary and Secondary Schools
- 611513 Apprenticeship Training
- 611519 Other Technical and Trade Schools
- 611699 All Other Miscellaneous Schools and Instruction
- 624410 Child Day Care Services
- 92312 Administration of Public Health Programs
- 92411 Administration of Air and Water Resource and Solid Waste Management Programs
- 92511 Administration of Housing Programs

4(b) Information Requested

The lead-based paint activities and renovation, repair, and painting regulations specify reporting and recordkeeping for training providers and individuals/firms undertaking lead-based paint activities and/or renovations in target housing and child-occupied facilities.

(i) Data Items

States

In order to obtain authorization from EPA to administer and enforce a program under section 404, states must prepare:

- A notice of intent to seek authorization
- An application for authorization identifying the agencies responsible for implementation, administration, and enforcement of the program, and a description of the authority and responsibilities vested in such agencies.

States that receive authorization for lead-based paint activities and/or renovation programs must submit to EPA a report summarizing implementation and enforcement activities, including a list of enforcement actions taken and any changes in content, administration, or enforcement of the state program.

Training Providers

To receive accreditation to provide lead-based paint activities or renovation training, training providers must submit the following documents to EPA/state, using the form entitled “Application and Instructions for Training Providers” or a similar form containing the required information:

- An accreditation statement that clearly indicates how the training program meets the minimum requirements for accreditation
- A quality control plan which outlines procedures for periodic revision of training material and exams, annual review of instructors, and adequacy of the training facilities
- A copy of the course agenda
- A copy of the student and instructor manuals if the training provider does not use the EPA model training materials
- A copy of the course test blueprint
- A description of activities and procedures used for hands-on training
- A description of the facilities and equipment to be used for lecture and hands-on training

Before giving a lead-based paint activity or renovation/dust sampling technician course, training providers must provide notification to the Agency, using either the sample form entitled “Lead-Based Paint Activities and Renovation Training Notification” or a similar form containing the required information. Training providers may provide electronic submissions using the Agency’s secure, Internet-based Central Data Exchange (CDX). (The paperwork activities, related burden and costs with CDX user registration are described in an ICR approved under OMB Control No. 2025-0003.) The initial notice must include the following:

- Notification type (original, updated, cancellation)

- Training program name, EPA accreditation number, address, and phone number
- Course discipline, type (initial, refreshers), and language used in course
- Date(s) and time(s) of training
- Training location's phone number and street address
- Principal instructor's name
- Training manager's name and signature

Training providers must update the Agency regarding any changes to training dates, course locations, course cancellations, or other changes to the original notice.

Following completion of lead-based paint activities, renovator, or dust-sampling technician courses, training providers must provide notice using either the sample form entitled "Lead-Based Paint Activities and Renovation Post-Training Notification" or a similar form containing the required information. Training providers may submit electronic submissions using the Agency's CDX. The notice must include the following information:

- Training program name, EPA accreditation number, address, phone number
- Course discipline and type (initial, refresher)
- Date(s) of training
- The following information for each student who took the course:
 - Name
 - Address
 - Date of birth
 - Course completion certificate number
 - Student test score
 - Training manager's name and signature

In addition, for renovator and dust-sampling technician courses, the training provider must take a digital photograph of each student and submit it to the EPA along with the training course follow-up material.

Training course providers must maintain the following records:

- Records regarding qualifications of training manager and principal instructor
- Current curriculum and course materials
- Course test blueprints
- Information regarding how hands-on assessments are conducted
- Quality control plan
- Results of students' hands-on assessments and course tests
- Record of each student's course completion certificate

Individuals/Firms

To obtain certification to perform lead-based paint activities or renovations in target housing or child-occupied facilities, firms must submit specific materials to EPA/state, using the sample EPA form “Application for Firms to Conduct Lead-based Paint Activities or Renovations” or a similar form requiring the same information:

- List of current permits, licenses, certifications, or registrations in the lead-based paint field held by the firm
- Explanation of any violations of lead-based paint
- Certification statement that the firm will employ only properly certified or trained individuals and that its employees will follow the specified work practice standards

Firms may later amend their applications to add or modify information. Lead-based paint activities firms must be recertified every three years, while renovation firms must be recertified every five years.

Firms conducting renovations are required to maintain records demonstrating compliance with the final rule requirements for using certified renovators and properly trained workers, posting signs, containing and cleaning the renovation work area, and performing a post-renovation cleaning verification or dust clearance testing after renovation activity is finished.

To obtain certification, individuals engaged in lead-based paint activities are required to submit specific materials to EPA/state:

- Inspectors, risk assessors, supervisors: accredited training course completion certificate, statement certifying the individual meets the education/experience prerequisites, proof of passage of the third-party exam
- Project designers: statement certifying individual meets the education/experience prerequisites, accredited training course completion certificate
- Workers: accredited training course completion certificate

In the performance of lead-based paint activities, firms/individuals must complete and retain a number of reports (contingent on the activity conducted), including:

- An inspection report describing the surfaces sampled for lead-based paint and the sampling results
- A lead hazard screen report, which includes an accounting of any paint or dust sampling results
- A risk assessment report, which includes an accounting of paint, dust, or soil sampling results and existing hazards
- An occupant protection plan identifying the measures that will be taken to protect building occupants from lead-based paint hazards
- An abatement report detailing the activities undertaken to eliminate the hazard

Certified firms must notify EPA prior to beginning lead-based paint abatement activities (except in emergency situations) and provide an updated notice if needed, using either the sample form entitled “Notification of Lead-Based Paint Abatement Activities” or a similar form containing the required information. Certified firms may provide electronic submissions using the Agency’s CDX. Notices should include the following information:

- Notification type (original, updated, cancellation)
- Date when lead-based paint abatement activities will start and end (approximation using best professional judgment)
- Firm’s name, EPA certification number, address, phone number
- Type of building (e.g. single family dwelling, multi-family dwelling, child-occupied facilities) on/in which abatement work will be performed
- Property name
- Property address including apartment/unit number (if applicable) for abatement work
- Documentation showing evidence of an EBL determination or a copy of the federal/state/tribal/local emergency abatement order (if applicable)
- Name and EPA certification number of the project supervisor
- Approximate square footage/acreage to be abated
- Brief description of abatement activities to be performed
- Name, title, and signature of the representative of the certified firm who prepared the notification

(ii) Respondent Activities

The rule specifies reporting and recordkeeping for authorized states, training providers, and individuals/firms undertaking lead-based paint activities and renovations. The rule does not require specific forms or applications for submissions.

States seeking authorization for the training rule and/or renovation program will perform the following activities:

- Read the regulation
- Compare any existing state program requirements to the minimum requirements of the federal regulation
- Develop and adopt new legislation as necessary
- Develop and promulgate new regulations as necessary
- Publish a notice of intent to seek authorization and provide an opportunity for public hearing
- Prepare and submit to EPA an application for program approval
- Maintain program application availability for public inspection for up to one year after submission
- Submit an annual report to EPA

Training providers must perform the following activities:

- Read the regulation
- Prepare and submit an accreditation application to accrediting entity
- Submit an initial and, if needed, amended notification of courses to be given
- Provide notice of completion of all courses offered and retain records
- Provide accrediting entity access to records as requested

Firms must perform the following activities:

- Read the regulation
- Submit applications for certification which includes proof of passage of third-party exam and/or course completion certificate, and
- Statement certifying individual meets education/experience requirements (applicable to risk assessors, supervisors, and project designers)
- Submit notification of abatement work (does not apply to firms applying for renovation only)
- Prepare and retain records

Individuals seeking certification perform the following activities:

- Read the regulation
- Submit a proof of passage of third-party exam and/or course completion certificate, and statement certifying individual meets education/experience requirements
- Retain records, if individual is incorporated or acting as a firm.

5. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA will perform the following activities in response to the submittals required by this rule:

- Receive, review, and act on applications from states
- Receive, review, and file reports from authorized states
- Receive, review, and act on applications for accreditation from training providers
- Receive, review, and file notices of trainings from training providers
- Receive, review, and file materials sent from accredited training providers
- Receive, review, and act on certification applications from firms/individuals
- Receive, review, and file notices of abatement activities from certified abatement firms.

5(b) Collection Methodology and Management

This section details the data elements for each type of respondent and for each reporting or recordkeeping activity. Note that EPA is cited as the accrediting and certifying body, as state programs may not necessarily adopt a program requiring the submission or retention of exactly the same materials as in the federal program. For the purposes of estimating burden in section 6 of this ICR, however, the Agency assumes that states adopt the federal program requirements for reporting and recordkeeping. In states without authorized programs, EPA is the accrediting and certifying body.

The rule provides general instructions to states seeking EPA authorization under this regulation. A state may submit an application to EPA any time. The elements necessary for application are as follows:

- A public notice of intent to seek authorization, with an opportunity for public hearing
- A transmittal letter from the Governor or tribal equivalent requesting program approval
- An Attorney General or tribal equivalent statement certifying the adequacy of the state's program authority
- Copies of all applicable state statutes and regulations
- The name of the primary agency that is or will be responsible for administering and enforcing the program and functions of any other agencies involved in administering the program
- A description of the program elements and an analysis of how these elements relate to the federal program elements under section 402
- A description of the resources the state intends to devote to the administration and enforcement of the program

States authorized for this rule will need to provide a report (or separate reports) to EPA describing any significant changes in the programs and enforcement activities.

The rule instructs training programs seeking accreditation for initial training programs to submit a one-time application to EPA covering the following elements:

- The training program's name, address, and telephone number
- A list of courses for which it is applying for accreditation
- A statement, signed by the training program manager, that certifies that the training program meets the minimum requirements (e.g., training hours) established in the rule
- A copy of the test blueprint, which describes the proportion of test questions devoted to each major course topic
- A detailed description of the facilities and equipment available for lecture and hands-on training
- A detailed description of the procedures for conducting the assessment of hands-on skills
- A copy of the program's quality control plan

- For programs that do not adopt the EPA model curriculum, the program must submit, in addition to the above materials, a copy of the student manuals and instructor notebooks to be used for each course, and a copy of the course agenda, which includes the time allocated for each course topic

Training programs must submit the following information to seek accreditation for refresher training courses (note that applications for refresher training may be simultaneously submitted with applications for full-length training programs):

- The training program's name, address, and telephone number
- A list of refresher courses for which it is seeking accreditation
- A copy of student manuals and instructor notebooks
- A statement signed by the training manager certifying compliance with rule provisions

Training programs must also seek re-accreditation from EPA every four years. In order to receive re-accreditation, the training program must submit:

- The training program's name, address, and telephone number
- A list of courses for which it is applying for re-accreditation
- A description of any changes or updates to the training facility or equipment that would adversely affect a student's ability to learn, since its last application was approved
- A statement from the training program manager that the training program complies at all times with all rule requirements

The rule specifies that training programs must retain the following records for three years and six months and make them available upon EPA request:

- Qualifications of training managers and work practice instructors
- Current curriculum/course materials, and documents reflecting any changes made to these materials
- The course test blueprint
- Information on how the hands-on assessment is conducted
- The quality control plan
- Results of the students' hands-on skills assessments and course tests, and a copy of each student's course completion certificate
- Any other material the program submitted to EPA as part of its accreditation application

The rule provides general instructions to individuals seeking certification to perform lead-based paint activities. Individuals must submit an application to EPA, including the following elements:

- Proof of training (for all individuals)

- Evidence that the individual meets the education or experience prerequisites (applicable to all but workers and inspectors)
- Proof of completing the standardized certification exam (applicable to all but workers and project designers).

Under the rule's provisions, individuals must seek re-certification every three years (five years for individuals who have passed a proficiency test as part of their training), submitting to EPA an application and a copy of the refresher course completion certificate.

The rule provides specific requirements for firms seeking certification. A firm must submit to EPA a letter indicating that the firm will employ only certified individuals to conduct lead-based paint activities and follow the work practice standards.

The rule requires that individuals/firms prepare reports during the conduct of lead-based paint activities and maintain the reports for no fewer than three years. The requirements are specific to the disciplines.

Following the conduct of an inspection, the inspector must prepare a report documenting the following:

- Date of inspection
- Address of building and units
- Date of construction of building and units
- Unit numbers (if applicable)
- Name, address, and telephone number of the owner of building and units
- Name, signature, and certification number of each certified inspector and/or risk assessor conducting testing
- Name, address and telephone of the certified firm employing the individual (if applicable)
- Each testing method and device and/or sampling procedure employed, including quality control data, and, if used, the serial number of the XRF device
- Specific locations of each painted component tested for lead-based paint
- Result of the inspection expressed according to the particular sampling method.

For a risk assessment:

- Date of risk assessment
- Address of residences and buildings
- Date of construction of residences and buildings
- Unit numbers (if applicable)
- Name, address and telephone number of the owner of residences and buildings
- Name, signature, and certification number of risk assessor conducting the assessment
- Name, address, and telephone number of certified firm employing the risk assessor (if applicable)
- Results of visual inspection

- Name, address, and telephone of each recognized laboratory conducting analyses of samples
- Testing methods and sampling procedures for paint analysis employed
- Specific locations of each painted component tested for the presence of LBP
- All data collected from on-site testing
- All results of laboratory analyses on samples
- Any other sampling results
- Any background information collected prior to the activity
- An evaluation of any previous inspections, analyses, or assessments of LBP, if applicable
- Description of the location and type of identified LBP hazards
- Description of options for addressing any LBP hazards.

For a lead hazard screen:

- First 15 items on the risk assessment list above
- Recommendations concerning desirability of follow-up risk assessment.

For all abatements, the individual/firm must first submit to EPA prior notification of abatement activities.

Before an abatement, the individual/firm must prepare an occupant protection plan describing the measures that the individual/firm will take during the abatement to protect building occupants from exposure to lead-contaminated dust and debris.

Following the abatement, the individual or supervisor must prepare a report detailing the following:

- Start and completion dates
- Name and address of each individual or firm conducting the abatement(s) and each supervisor assigned to the project
- The occupant protection plan
- Name, address, and signature of each certified risk assessor or inspector conducting sampling and the date of clearance testing
- Results of clearance testing and all soil analyses, and name of laboratory conducting them
- A detailed description of the abatement, including method employed, locations of rooms and/or components, reasons for selecting abatement methods for particular components

The Agency will make use of existing technology to simplify the application and notification processes where available. In addition to the more traditional methods (mail, commercial delivery service, or hand delivery), the Agency will accept faxed course notifications from training providers as well as notifications through the Central Data Exchange (CDX). In

addition, lead abatement and evaluation firms may use CDX to apply for certification and re-certification, but individuals, renovation, repair, and painting firms must apply by mail.

5(c) Small Entity Flexibility

EPA has attempted to ensure that regulatory requirements do not unduly burden small businesses. The certification process for firms and individuals is very simple. EPA allows flexibility in the way that information is prepared and presented, in that there are no mandatory forms to complete, CDX can be used in many instances, and faxed notifications are also permitted.

5(d) Collection Schedule

For authorization, certification and accreditation, collection activities will occur according to the following schedule:

- States/tribes may submit an application for program authorization at any time
- Training providers may apply for accreditation at any time
- Training programs must apply for re-accreditation every four years following initial accreditation
- Firms/individuals may apply for certification at any time
- Firms must apply for re-certification every five years after initial certification for renovations
- Firms/individuals must apply for re-certification every three years (five for individuals who have passed a proficiency test as part of their training) after initial certification for lead-based paint activities

The Agency believes that receipt of notification of five and seven business days respectively prior to conducting lead-based paint abatement activities or training courses is necessary to facilitate the inspection of abatement and training locations. The regulation also includes provisions for updating the original notification. The Agency determined that the time periods for initial notification will also apply to a change in course location, or if the course is to be presented earlier than described in the original notification. Other changes, including cancellation of courses or abatement projects, need only be received by the Agency at least two business days before a training course is scheduled to begin, or by the start date of an abatement activity. Such notification periods are appropriate to allow proper allocation of EPA compliance monitoring and enforcement resources, and to prevent the arrival of Agency personnel at the wrong location or time.

6. ESTIMATING THE BURDEN AND COST

This section estimates the burden of reporting and recordkeeping for the lead-based paint (LBP) activity requirements under sections 402 (a) and 404 of TSCA and the renovation, repair, and painting (RRP) requirements under TSCA section 402(c)(3). This burden combines the burdens approved under three previously approved ICRs: (1) EPA ICR No. 1715.09 (the ICR

renewal for the lead-based paint activities/abatement program), (2) EPA ICR No. 1715.10 (the ICR addendum for the 2008 RRP final rule), and (3) EPA ICR No. 1715.12 (the ICR addendum for the 2010 RRP opt-out and recordkeeping final rule)². This supporting statement provides average annual burden and cost estimates for the next three years of the program. All costs are presented in year 2009 dollars.

Sections 6(a) and 6(b) estimate the respondents' paperwork burdens and costs, respectively. Section 6(c) estimates agency costs, section 6(d) summarizes the bottom line burden and costs, section 6(e) describes the reasons for changes in burden from the previous ICRs, and section 6(f) presents the burden statement.

6(a) Estimating Respondent Burden

This section presents the estimated hour burden associated with this information collection. Five types of respondents will be affected by this information collection activity:

- 1) **LBP training providers:** training providers who are accredited to offer LBP evaluation and abatement training courses;
- 2) **RRP training providers:** training providers who are accredited to offer Renovator training courses;
- 3) **LBP firms:** firms who are certified to perform lead-based paint evaluation and abatement activities;
- 4) **RRP firms:** firms who are certified to perform renovation, repair, or painting (RRP) activities; and
- 5) **LBP professionals:** individuals who are certified to perform lead-based paint evaluation and abatement activities.

The burdens and costs fall into the following categories: 1) applying for initial accreditation or certification, 2) applying for renewal of accreditation or certification, 3) annual reporting (or reporting during the course of the year), and 4) annual recordkeeping (or recordkeeping during the course of the year). The reporting burden estimates include the time associated with completing and sending the reports to the appropriate authority, as well as the time required for collecting information needed to complete the report. The recordkeeping burden estimates include the time associated with copying, filing and maintaining the records. In addition, states, tribes, other governmental entities administering authorized programs, and the federal government will be affected in their role as administrators of the programs.

Training Provider Burden: Number of Training Providers and Accreditation Applications

EPA estimated the numbers of two different types of training providers: (1) training providers offering lead-based paint evaluation and abatement activity courses (LBP training providers), and (2) training providers offering renovator courses (RRP training providers). The number of LBP training providers was estimated from the number of accredited training provider

² EPA ICR No. 1715.11 was the ICR addendum for the opt-out and recordkeeping *proposed* rule, and was superseded by the ICR addendum for the *final* rule.

applications in EPA administered regions in 2007-2009 according to the Federal Lead-Based Paint Program (FLPP) database. Since these data only pertain to LBP training providers who operate in areas administered by EPA, the number of LBP training providers operating nationwide was estimated assuming that the number of entities and activities in EPA administered areas represents 17 percent of the national number of entities and activities. This value is derived in EPA's 1999 *Economic Analysis of the Final TSCA Section 402(a)(3) Lead-Based Paint Accreditation And Certification Fee Rule*, which estimated that 17 percent of the lead-based paint hazards nationwide are in EPA administered states compared to states administering their own programs.

There were 325 training providers accredited to offer lead-based paint activities courses in EPA administered areas during the period 2007-2009. As described above, the number of training providers accredited nationally is estimated as 325 divided by 17 percent, or 1,912 LBP training providers. Based on the number of initial accreditation and renewal accreditation applications received by EPA, it appears that most training providers file one of these applications each year. There are 10 different lead-based paint activities courses, an initial and a refresher course for five different disciplines, and while one application can be used to apply for multiple accreditations, it appears that rather than renewing all accreditations once every four years, training providers stagger their renewal accreditation applications, renewing accreditation for a few courses each year. Based on the average number of applications received between 2007 and 2009, it was estimated that about 150 training providers file an initial accreditation application and 130 file a renewal accreditation application with EPA in a given year.³ Thus, by dividing these numbers by 17 percent the national number of applications is estimated to be 882 initial accreditation applications and 765 renewal accreditation applications for LBP training providers.

EPA expects there will be approximately 600 training providers accredited for Renovator training. Since renewal accreditation is required every 4 years, it was estimated that one quarter of training providers will seek accreditation in a given year. Based on the number of LBP training provider applications recorded in the FLPP database between 2007 and 2009, 54 percent of accreditations are initial accreditations, implying that either there is a high rate of turnover for training providers, or that training providers may let their accreditation lapse if they offer these courses infrequently. Since 54 percent of LBP training provider accreditation applications are initial applications, this implies a turnover rate of about 14% per year ($14\% = 54\% \text{ divided by } 4 \text{ years}$). Based on this, it is estimated that EPA will receive 81 initial accreditation applications and 69 refresher accreditation applications each year over the next three years for RRP training providers.

³ The FLPP database indicates that there were about 300 initial accreditation applications for the worker discipline course, which is the most frequently offered course. Since there are two types of worker courses (initial and refresher), 300 was divided by two to estimate that 150 training providers apply for initial accreditation annually. Thus, it is assumed that training providers applying for accreditation in other disciplines are applying for worker course accreditation at the same time. The number of training providers applying for renewal accreditation is estimated using the same method and assumptions (there were about 259 renewal accreditation applications for the worker discipline course).

Exhibit 6.1: Annual Number of Training Providers

Entity Type	Number of Entities ^a
LBP Activity Training Providers	
Initial Accreditation	883
Renewal Accreditation	765
Cohort not applying for accreditation	265
Total	1,912
Renovator Training Providers	
Initial Accreditation	81
Renewal Accreditation	69
Cohort not applying for accreditation	450
Total	600

^a Number of entities estimated based on data in EPA's FLPP database.
See text above table for detailed description.

Training Provider Burden: Accreditation and Notification Burden

Exhibit 6.2 presents the hour burden for training providers offering LBP evaluation and abatement courses as a result of this information collection. Training providers applying for their initial accreditation incur a burden associated with becoming familiar with the rule's requirements and completing an accreditation statement and quality control plan. Those applying for renewal accreditation incur a burden associated with the renewal accreditation statement. All training providers incur recordkeeping and reporting burdens associated with notifying EPA about upcoming course offerings and providing EPA with notifications that list the individuals who have completed their courses. The estimates of burden hours per response are adopted from previous ICR renewals, and the numbers of notifications are estimated based on the number of notifications received between 2007 and 2009.

Exhibit 6.2: Annual LBP Training Provider Hour Burden

Activities	Professional Hours ^a	Clerical Hours ^a	Burden Hours Per Activity ^a	Number of Training Providers ^b	Number of Events Per Provider ^c	Total Burden Hours
<i>Initial accreditation cohort</i>						
Rule Familiarization	8.00	-	8.00	882	1	7,056
Accreditation Statement	7.60	2.00	9.60	882	1	8,467
Quality Control Plan	8.00	2.00	10.00	882	1	8,820
<i>Re-accreditation cohort</i>						
Accreditation Statement	3.80	1.00	4.80	765	1	3,672
Audit	0.20	0.40	0.60	765	1	459
<i>All Firms</i>						
Pre-Notification	-	0.20	0.20	1,912	7	2,677
Re-Notification	-	0.20	0.20	1,912	3	1,147
Post-Notification	-	1.60	1.60	1,912	4	12,237
Recordkeeping	-	0.80	0.80	1,912	1	1,530
Total Reporting						44,535
Total Recordkeeping						1,530
Total Reporting and Recordkeeping						46,065
^a Hour estimates are from the previously approved ICR for LBP activity training providers (EPA ICR No. 1715.09). The hour estimates were rounded to one significant digit for this ICR. ^b See Exhibit 6.1. ^c Number of notifications are estimated based on the average number of notifications received by EPA between 2007 and 2009.						

Exhibit 6.3 presents the hour burden for RRP training providers offering Renovator courses as a result of this information collection. Training providers applying for their initial accreditation incur a burden associated with becoming familiar with the rule's requirements and completing an accreditation application. Those applying for renewal accreditation incur a burden associated with completing the application. All training providers incur recordkeeping and reporting burdens associated with notifying EPA about upcoming course offerings and providing EPA with notifications and digital photos of the individuals who have completed their courses.

The estimates for burden hours per response for training providers were slightly higher in the previously approved ICR for *LBP activity* training providers (EPA ICR No. 1715.09) compared to the previously approved ICR for *RRP activity* training providers (EPA ICR No. 1715.10). For consistency the estimates for burden hours per response from the previously approved ICR for LBP activity training providers are adopted here for both types of training providers. The estimated numbers of notifications per provider are taken from previously approved ICRs for RRP training providers (EPA ICR No. 1715.10 and 1715.12).

Exhibit 6.3: Annual RRP Training Provider Hour Burden

Activity	Professional Hours ^a	Clerical Hours ^a	Burden Hours Per Activity ^a	Number of Training Providers ^b	Number of Events Per Provider ^c	Total Burden Hours
<i>Initial accreditation cohort</i>						
Rule Familiarization	8.00	0.00	8.00	81	1	648
Accreditation Statement	7.60	2.00	9.60	81	1	778
Quality Control Plan	8.00	2.00	10.00	81	1	810
<i>Re-accreditation cohort</i>						
Accreditation Statement	3.80	1.00	4.80	69	1	331
Audit	0.20	0.40	0.60	69	1	41
<i>All Firms</i>						
Pre-Notification	0.00	0.20	0.20	600	14	1,680
Re-Notification	0.00	0.20	0.20	600	2	240
Post-Notification	0.00	1.60	1.60	600	14	13,440
Digital Photo	0.00	1.30	1.30	600	14	10,920
Recordkeeping	0.00	0.80	0.80	600	1	480
Total Reporting						28,888
Total Recordkeeping						480
Total Reporting and Recordkeeping						29,368
^a Hour estimates are from the previously approved ICR for LBP activity training providers (EPA ICR No. 1715.09). The hour estimates were rounded to one significant digit for this ICR. ^b See Exhibit 6.1. ^c Number of notifications are from the previously approved ICRs for RRP activity training providers (EPA ICR No. 1715.10 and 1715.12). They were rounded to the nearest digit for this ICR.						

Firm Burden: Number of Firms and Certification Applications

Exhibit 6.4 presents EPA's estimates of the annual number of firms and certification applications. During the 2007-2009 period, LBP firms submitted an average of 754 and 791 initial and renewal certification applications per year, respectively, to EPA. Since renewal certification is required every three years, it was estimated that one third of firms will seek certification in each year. As described above, the number of national LBP firm certifications (4,435 initial and 4,653 renewal) is estimated by dividing the EPA administered estimates (754 initial and 791 renewal) by 17 percent. The number of LBP firms in the 2nd year cohort is assumed to be equal to half the number applying for either initial or renewal certification.

The number of RRP firms (312,785 private firms and 7,718 government firms) affected by this information collection request was taken from EPA's (2008) *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Final Rule for Target Housing and Child-Occupied Facilities* and EPA's (2010) *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Opt-out and Recordkeeping Final Rule for Target Housing and Child-Occupied Facilities*. These economic analyses estimated a turnover rate of about 18 percent per year, implying that 18 percent of the stock of certified firms will be applying for initial certification annually. Based on this, it is estimated that EPA will receive 56,301 private firm and 1,389 government firm initial certification applications each year over the next three

years. Since this is a recent rule no renewal certifications are expected during this reporting period.

Exhibit 6.4: Annual Number of Firms and Certification Applications

Entity Type	Number of Entities ^a
LBP Activity Firms	
Initial Certification	4,435
Renewal Certification	4,653
2nd year cohort ^b	4,544
Total	13,632
RRP Private Firms	
Initial Certification	56,301
Renewal Certification	-
2nd, 3rd and 4th year cohort	256,484
Total	312,785
RRP Government Firms	
Initial Certification	1,389
Renewal Certification	-
2nd, 3rd and 4th year cohort	6,329
Total	7,718

^a Number of LBP firms estimated based on data in EPA's FLPP database.

Number of RRP firms estimated based on related RRP economic analyses in 2008 and 2010. See text above table for detailed description.

^b The number of LBP activity firms in the 2nd year cohort is estimated as the average of those in the initial and renewal certification cohorts.

Firm Burden: Certification, Reporting and Recordkeeping Burden

Exhibit 6.5 presents the hour burden for LBP activity firms as a result of this information collection. Firms applying for their initial certification incur a burden associated with becoming familiar with the rule's requirements and completing the certification application. Those applying for renewal certification incur a burden associated with the renewal certification application. All LBP firms incur recordkeeping and reporting burdens associated with lead hazard evaluation reports, notifying EPA about upcoming abatements, preparing occupant protection plans, and preparing post-abatement reports.

Assumptions developed for previous LBP activity ICR renewals are the basis for the estimated burden hours per response and the number of evaluation reports per LBP firm. The number of initial certifications, renewal certifications, notifications, and abatements per firm are estimated from the average number of applications and notifications received by EPA between 2007 and 2009. As described above, the number of activities in EPA administered areas is divided by 17 percent to extrapolate to national estimates.

Exhibit 6.5: Annual LBP Firm Certification, Reporting, and Recordkeeping Burden Hours

Activity	Professional Hours ^a	Clerical Hours ^a	Burden Hours Per Activity ^a	Number of Firms ^b	Number of Events Per Firm ^c	Total Burden Hours
<i>Initial certification cohort</i>						
Initial Certification	7.50	-	7.50	4,435	1	33,263
Certification recordkeeping	-	0.01	0.01	4,435	1	44
<i>Renewal certification cohort</i>						
Renewal certification	1.50	-	1.50	4,653	1	6,980
Certification recordkeeping	-	0.01	0.01	4,653	1	47
<i>All Firms</i>						
Evaluation reports	1.86	-	1.86	13,632	16	405,688
Pre-abatement notifications	0.50	-	0.50	13,632	2	13,632
Abatement re-notifications	0.22	-	0.22	2,616	1	576
Occupant protection plan	1.00	-	1.00	13,632	2	27,264
Post-abatement report	2.00	-	2.00	13,632	2	54,528
Recordkeeping for reports and notifications	-	0.01	0.01	13,632	22	2,999
Recordkeeping for re-notifications	-	0.01	0.01	2,616	1	26
Total Reporting						541,930
Total Recordkeeping						3,116
Total Burden						545,046
^a Hour estimates are from the previously approved ICR for LBP activities (EPA ICR No. 1715.09). The hour estimates were rounded to two significant digits for this ICR. Certifications and notifications are prepared by Supervisors, evaluation reports are prepared by Inspectors and Risk Assessors, and occupant protection plans are prepared by Project Designers. ^b See Exhibit 6.4. ^c Number of certifications, notifications, protection plans, and post abatement reports are estimated based on data in EPA's FLPP database between 2007 and 2009. The number of evaluations is estimated based on the previously approved ICR (EPA ICR No. 1715.09). The number of recordkeeping events is estimated as the sum of the reports and notifications. Numbers were rounded to the nearest two digits for this ICR.						

The burden for RRP firms differs from that for LBP firms because of different regulatory requirements. Exhibit 6.6 estimates the burden hours for privately owned RRP firms as a result of this information collection. Exhibit 6.7 presents the hour burden for public schools that will be certified RRP firms as a result of this information collection. Firms applying for their initial certification incur a burden associated with becoming familiar with the rule's requirements and completing the certification application. Those applying for renewal certification incur a burden associated with the renewal certification application. All firms incur recordkeeping and reporting burdens associated with providing owners and occupants with checklists that document the measures taken to ensure the work was performed in a lead-safe manner. The estimates of the numbers of activities and the burden hours per response are adopted from EPA's (2008) *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Final Rule for Target Housing and Child-Occupied Facilities* and EPA's (2010) *Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Opt-out and Recordkeeping Final Rule for Target Housing and Child-Occupied Facilities*.

Exhibit 6.6: Private RRP Firm Certification, Reporting, and Recordkeeping Burden Hours

Activity	Professional Hours ^a	Number of Firms ^a	Number of Events Per Firm ^a	Total Burden Hours
Initial Certification	3.50	56,301	1	197,054
Checklist Provision				
Owner-occupied housing	0.05	312,785	28	437,899
Renter-occupied housing	0.05	312,785	30	469,178
Owner-performed COF ^b	0.05	37,534	1	1,877
Contractor, owner-occ. COF ^b	0.05	265,867	1	13,293
Contractor, renter-occ. COF ^b	0.05	12,511	1	626
Recordkeeping	4.80	312,785	1	1,501,368
Total				2,621,294
^a The estimates of the numbers of firms, activities and the burden hours per response are adopted from EPA's (2008) Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Final Rule for Target Housing and Child-Occupied Facilities and EPA's (2010) Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Opt-out and Recordkeeping Final Rule for Target Housing and Child-Occupied Facilities. ^b Child Occupied Facility (COF)				

Exhibit 6.7: Government (Public Schools) RRP Firm Certification, Reporting, and Recordkeeping Burden Hours

Burden Element	Professional Hours ^a	Number of Firms ^a	Number of Events Per Firm ^a	Total Burden Hours
Initial Certification	3.50	1,389	1	4,862
Checklist Provision				
Owner-performed COF ^b	0.05	7,718	8	3,087
Recordkeeping	4.80	7,718	1	37,046
Total				44,995
^a The estimates of the numbers of firms, activities and the burden hours per response are adopted from EPA's (2008) Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Final Rule for Target Housing and Child-Occupied Facilities and EPA's (2010) Economic Analysis for the TSCA Lead Renovation, Repair, and Painting Program Opt-out and Recordkeeping Final Rule for Target Housing and Child-Occupied Facilities. ^b Child Occupied Facility (COF)				

Individual Reporting Burden

Exhibit 6.8 presents the hour burden for individuals engaged in LBP activities as a result of this information collection. Note that there is no burden for individuals under the RRP program associated with this ICR because Renovators are not required to send an application to EPA. Individuals incur burdens associated with completing the applications for initial and renewal certification. The burden per individual is the same as estimated under previous ICR renewals and the numbers of affected individuals are estimated from the average numbers of applications received by EPA between 2007 and 2009. As described above, the number of

individuals in EPA administered areas is divided by 17 percent to extrapolate to national estimates.

Exhibit 6.8: LBP Individual Certification Burden Hours

Burden Element	Professional Hours	Number of Individuals ^a	Total Burden Hours
Initial Inspector Certification	1.00	1,696	1,696
Renewal Inspector Certification	1.00	1,167	1,167
Initial Risk Assessor Certification	1.00	5,294	5,294
Renewal Risk Assessor Certification	1.00	6,312	6,312
Initial Supervisor Certification	1.00	3,410	3,410
Renewal Supervisor Certification	1.00	3,212	3,212
Initial Worker Certification	0.50	6,704	3,352
Renewal Worker Certification	0.50	2,792	1,396
Initial Project Designer Certification	0.50	265	133
Renewal Project Designer Certification	0.50	316	158
Total Individual Burden			26,130
^a The numbers of affected individuals are estimated from the average numbers of applications received by EPA between 2007 and 2009. As described above, the number of individuals in EPA administered areas is divided by 17 percent to extrapolate to national estimates.			

6(b) Estimating Respondent Costs

The cost estimates addressed in this section are based on the burden estimates discussed in section 6(a). Wage rates for each category of personnel are derived with methods and from sources either identical to or very similar to those used in previous ICR renewals and related economic analyses. However, to simplify the calculations a uniform loading factor of 60 percent for fringe benefits and overhead was applied to all categories of labor for this ICR, whereas earlier related economic analyses utilized occupation-specific loading rates in some cases.

Non-governmental wages are drawn from the 2009 full-time mean hourly earnings annual data in the Bureau of Labor Statistics (BLS) *National Compensation Survey: Occupational Wages in the United States, June 2010*, Table 2-2 (Private industry, selected occupations, mean hourly earnings). The BLS occupational categories have been revised since the most previous ICR renewals, and therefore the wages for the occupations that best match the ICR labor categories were selected as shown in Exhibit 6.9.

Exhibit 6.9: Private Sector Wage Rates for Calculating Labor Costs (2009\$)

<i>ICR Labor Category</i>	<i>BLS Occupation Category</i>	<i>June 2009 Wage Rate</i>	<i>Wage with Fringe and Overhead</i>
Training Provider Professional	Professional and related	\$32.16	\$51.46
Training Provider and LBP Firm Clerical	Office and administrative support occupations	\$16.28	\$26.05
Inspector or Risk Assessor	Environmental engineering technicians	\$22.48	\$35.97
Project Designer	Environmental Engineer	\$39.74	\$63.58
Supervisor/Renovator	Supervisors/managers of construction trades and extraction workers	\$29.94	\$47.90
Abatement Worker	Construction and extraction occupations	\$17.50	\$28.00

Training Provider Cost: Accreditation and Notification Cost

Exhibit 6.10 and Exhibit 6.11 present the costs associated with this information collection for training providers offering LBP activity courses and Renovator courses, respectively. The estimates of the material costs per response are based on the assumptions from ICR renewals, updated to 2009 dollars. These costs are calculated using the burden estimates presented in Exhibit 6.2 and Exhibit 6.3, the wage rates presented above in Exhibit 6.9, and a notification material cost of \$0.10 for a photocopy, \$0.03 for an envelope, and \$0.44 for a stamp.

Exhibit 6.10: LBP Training Provider Cost (2009\$)

Cost Element	Number of Training Providers	Events per Training Provider	Material Cost Per Event	Total Material Cost^a	Total Labor Cost^b	Total Cost
<i>Initial accreditation cohort</i>						
Rule Familiarization	882	1	-	-	\$363,102	\$363,102
Accreditation Statement	882	1	-	-	\$390,899	\$390,899
Quality Control Plan	882	1	-	-	\$409,054	\$409,054
<i>Re-accreditation cohort</i>						
Accreditation Statement	765	1	-	-	\$169,522	\$169,522
Audit	765	1	-	-	\$15,845	\$15,845
<i>All Firms</i>						
Pre-Notification	1,912	7	\$0.57	\$7,629	\$69,731	\$77,360
Re-Notification	1,912	3	\$0.57	\$3,270	\$29,885	\$33,154
Post-Notification	1,912	4	\$0.57	\$4,359	\$318,769	\$323,128
Recordkeeping	1,912	1	-	-	\$39,846	\$39,846
Total Reporting				\$15,258	\$1,766,806	\$1,782,063
Total Recordkeeping				-	\$39,846	\$39,846
Total Reporting and Recordkeeping				\$15,258	\$1,806,652	\$1,821,909

^a Material costs for notifications include \$0.10 for a photocopy, \$0.03 for an envelope, and \$0.44 for a stamp.

^b Wage rates of \$51.46 and \$26.05 are applied to the professional and clerical hour burdens, respectively, presented in Exhibit 6.2. See Exhibit 6.9 for a summary of wage rate definitions and sources.

Exhibit 6.11: RRP Training Provider Cost (2009\$)

Cost Element	Number of Training Providers	Events per Training Provider	Material Cost Per Event	Total Material Cost ^a	Total Labor Cost ^b	Total Cost
<i>Initial accreditation</i>						
Rule Familiarization	81	1	\$0.00	\$0	\$33,346	\$33,346
Accreditation Statement	81	1	\$0.00	\$0	\$35,899	\$35,899
Quality Control Plan	81	1	\$0.00	\$0	\$37,566	\$37,566
<i>Re-accreditation cohort</i>						
Accreditation Statement	69	1	\$0.00	\$0	\$15,290	\$15,290
Audit	69	1	\$0.00	\$0	\$1,429	\$1,429
<i>All firms</i>						
Pre-Notification	600	14	\$0.57	\$4,788	\$43,764	\$48,552
Re-Notification	600	2	\$0.57	\$684	\$6,252	\$6,936
Post-Notification	600	14	\$0.57	\$4,788	\$350,112	\$354,900
Digital Photo	600	14	\$0.57	\$4,788	\$284,466	\$289,254
Recordkeeping	600	1	\$0.00	\$0	\$12,504	\$12,504
Total Reporting				\$15,048	\$808,125	\$823,173
Total Recordkeeping				\$0	\$12,504	\$12,504
Total Reporting and Recordkeeping				\$15,048	\$820,629	\$835,677
^a Material costs for notifications include \$0.10 for a photocopy, \$0.03 for an envelope, and \$0.44 for a stamp.						
^b Wage rates of \$51.46 and \$26.05 are applied to the professional and clerical hour burdens, respectively, presented in Exhibit 6.3. See Exhibit 6.9 for a summary of wage rate definitions and sources.						

Firm Certification, Reporting and Recordkeeping Costs

Exhibit 6.12, Exhibit 6.13, and Exhibit 6.14 present the costs associated with this information collection for LBP activity firms, private RRP firms, and government RRP firms, respectively. The estimates of the material costs per response are based on assumptions developed for previous ICR renewals, updated to 2009 dollars. These costs are calculated using the burden estimates presented in Exhibit 6.5, Exhibit 6.6, and Exhibit 6.7; the wage rates used are presented in Exhibit 6.9 and the material costs used are \$0.10 per photocopy, \$0.03 for an envelope, and \$0.44 for a stamp.

Exhibit 6.12: LBP Firm Cost (2009\$)

Cost Element	Number of Firms	Events per Firm	Material Cost Per Event	Total Material Cost ^a	Total Labor Cost ^b	Total Cost
<i>Initial certification cohort</i>						
Initial certification	4,435	1	\$0.20	\$887	\$1,593,274	\$1,594,161
Certification recordkeeping	4,435	1	\$0.00	\$0	\$1,155	\$1,155
<i>Renewal certification cohort</i>						
Renewal certification	4,653	1	\$0.20	\$931	\$334,318	\$335,249
Certification recordkeeping	4,653	1	\$0.00	\$0	\$1,212	\$1,212
<i>All Firms</i>						
Evaluation reports	13,632	16	\$0.30	\$65,434	\$14,592,609	\$14,658,042
Pre-abatement notifications	13,632	2	\$0.67	\$18,267	\$652,973	\$671,240
Abatement re-notifications	2,616	1	\$0.67	\$1,753	\$27,567	\$29,320
Occupant protection plan	13,632	2	\$0.30	\$8,179	\$1,733,445	\$1,741,624
Post-abatement report	13,632	2	\$0.30	\$8,179	\$2,611,891	\$2,620,070
Recordkeeping for reports and notifications	13,632	22	\$0.00	\$0	\$78,125	\$78,125
Recordkeeping for re-notifications	2,616	1	\$0.00	\$0	\$681	\$681
Total Reporting				\$103,629	\$21,546,077	\$21,649,706
Total Recordkeeping				\$0	\$81,174	\$81,174
Total Reporting and Recordkeeping				\$103,629	\$21,627,251	\$21,730,880

^a Material costs include \$0.10 per copy for photocopies. For notifications, material costs include \$0.03 for an envelope and \$0.44 for a stamp.

^b Wage rates of \$47.90 (Supervisor) are applied to the professional hour burdens presented in Exhibit 6.5 for certifications and notifications. The Inspector/Risk Assessor wage rate (\$35.97) is applied to the evaluation report burden presented in Exhibit 6.5. The Project Designer wage rate (\$63.58) is applied to the occupant protection plan burden presented in Exhibit 6.5. See Exhibit 6.9 for a summary of wage rate definitions and sources.

Exhibit 6.13: Private RRP Firm Cost (2009\$)

[illegible]

Exhibit 6.14: Government RRP Firm Cost (2009\$)

Cost Element	Number of Firms	Events per Firm	Material Cost Per Event	Total Material Cost ^a	Total Labor Cost ^b	Total Cost
Initial Certification	1,389	1	\$0.57	\$792	\$232,866	\$233,658
Checklist Provision						
Owner-performed COF	7,718	8	\$0.10	\$6,174	\$147,877	\$154,051
Recordkeeping	7,718	1	-	-	\$1,774,523	\$1,774,523
Total				\$6,966	\$2,155,265	\$2,162,231

^a Material costs include \$0.10 per copy for photocopies. For initial certification, material costs include \$0.03 for an envelope and \$0.44 for a stamp.

^b Wage rates of \$47.90 (Renovator) are applied to the professional hour burdens presented in Exhibit 6.7. See Exhibit 6.9 for a summary of wage rate definitions and sources.

Individual Certification, Reporting and Recordkeeping Costs

Exhibit 6.15 presents the costs associated with this information collection for individuals performing LBP activities. These costs are calculated using the burden estimates presented in Exhibit 6.8 and the wage rates presented in Exhibit 6.9.

Exhibit 6.15: Individual Costs (2009\$)

Cost Element	Number Respondents	Wage Rate	Total Cost
Initial Inspector Certification	1,696	\$35.97	\$61,005
Renewal Inspector Certification	1,167	\$35.97	\$41,977
Initial Risk Assessor Certification	5,294	\$35.97	\$190,425
Renewal Risk Assessor Certification	6,312	\$35.97	\$227,043
Initial Supervisor Certification	3,410	\$47.90	\$163,339
Renewal Supervisor Certification	3,212	\$47.90	\$153,855
Initial Worker Certification	6,704	\$28.00	\$93,856
Renewal Worker Certification	2,792	\$28.00	\$39,088
Initial Project Designer Certification	265	\$63.58	\$8,424
Renewal Project Designer Certification	316	\$63.58	\$10,046
Total Individual Costs			\$989,058

See Exhibit 6.9 for a summary of wage rate definitions and sources. These wage rates are applied to the professional burden hours presented in Exhibit 6.8

6(c) Estimating Agency Cost

Government Wage Rates

The wage rates for state and federal government employees are taken from the federal government's GS Salary Table for hourly wages, effective January 2009 (See Exhibit 6.16). The wages for EPA headquarters workers are taken from the table including locality pay for the Washington-Baltimore area.

Exhibit 6.16: Government Wage Rates

<i>ICR Labor Category</i>	<i>Government Occupation Category</i>	<i>2009 Wage Rate</i>	<i>Wage With Fringe And Overhead</i>
State and EPA Region Professional	GS 11, step 1	\$27.03	\$43.25
State and EPA Region Clerical	GS 6, step 1	\$16.44	\$26.30
State and EPA Region Managerial	GS 13, step 1	\$38.53	\$61.65
Headquarters Professional	GS 11, step 1; DC area	\$29.22	\$46.75

Authorized Program Costs

This ICR renewal includes an estimate for the entities authorized to administer the LBP and RRP programs. As discussed in section 6(a) of this ICR, 39 states and three tribal areas, as well as Puerto Rico and the District of Columbia, have sought and been granted authorization to administer their own LBP activity programs under TSCA section 402. The labor hours incurred by authorized programs includes the following activities:

- Application processing and recordkeeping
- Certification exam processing and recordkeeping
- Training course audits
- Fee transactions and waivers
- Issuance of certification documents
- Public assistance/outreach
- Reporting (to overseeing agencies)
- Other management

Exhibit 6.17 presents the labor hours incurred by states, tribes, and other government entities authorized to administer LBP activity programs. The estimated hours per activity incurred by authorized programs were derived in EPA's (2009) *Economic Analysis for the TSCA Section 402 Lead-Based Paint Program Accreditation and Certification Fee Rule*. The numbers of events are estimated as described above for each respondent type. Following the previously approved ICR, 83 percent of LBP activity events nationwide are estimated to occur in areas administered by authorized programs. EPA expects there will be 20 states total in the next 3 years with the authorization to administer the RRP program (about 40% of the states). For example, since there are 44 authorized programs, 765 renewal LBP activity training provider accreditations and 69 renewal RRP training provider applications, it is estimated that there are 15 renewal training provider accreditation applications on average for authorized programs: $15 = (83\% * 765) / 44 + (40\% * 69) / 44$.

Exhibit 6.17: Authorized Program Labor Hours

	Authorized Programs ^a	Number Events Per Program ^b	Labor Hours Per-Event ^c			Total Labor Hours
			Prof.	Cler.	Mgmt.	
Initial Training Provider Accreditation.	44	18	0.03	17.37	0.16	13,908
Renewal Training Provider Accreditation	44	15	0.01	3.66	0.25	2,587
Initial Firm Certification	44	608	0.05	0.59	0.00	17,121
Renewal Firm Certification	44	88	0.04	0.74	0.00	3,020
Initial Individual Certification	44	328	0.07	0.69	0.01	11,113
Renewal Individual Certification	44	260	0.05	0.81	0.01	9,953
Other Administrative Activities	44	1,317	0.01	0.01	0.01	1,738
Total						59,440
^a 39 states and three tribal areas, as well as Puerto Rico and the District of Columbia, have sought and been granted authorization to administer their own LBP activity programs under TSCA section 402. About half of the states authorized to administer the LBP activity program are projected to obtain authorization to administer the RRP program over the next three years. ^b The numbers of events are estimated as described above for each respondent type, and following the previously approved ICR (EPA ICR No. 1715.09), 83 percent of LBP activity events nationwide are estimated to occur in areas administered by authorized programs. ^c The estimated labor hours incurred by authorized programs were derived in EPA's (2009) <i>Economic Analysis for the TSCA Section 402 Lead-Based Paint Program Accreditation and Certification Fee Rule</i> . Time estimates were rounded to the nearest significant two digits and estimates less than 0.01 were rounded up to 0.01.						

This ICR renewal includes a cost estimate for the administration of the LBP and RRP programs by authorized programs. As discussed in section 6(a) of this ICR, 39 states and three tribal areas, as well as Puerto Rico and the District of Columbia, have sought and been granted authorization to administer their own programs under TSCA section 402. Exhibit 6.18 presents the average annual total costs to authorized programs from this information collection.

Exhibit 6.18: Authorized Program Costs (2009\$)

Cost Element	Total Cost
Initial Training Provider Accreditation	\$370,650
Renewal Training Provider Accreditation	\$73,988
Initial Firm Certification	\$472,962
Renewal Firm Certification	\$82,055
Initial Individual Certification	\$314,488
Renewal Individual Certification	\$275,498
Other State Program Administration Activities	\$76,028
Total	\$1,665,669
Total costs are calculated by applying the wage rates of \$43.25, \$26.30, and \$61.65 to the hour burdens presented in Exhibit 6.17 for professional, clerical and managerial, respectively. See Exhibit 6.9 for a summary of wage rate definitions and sources.	

EPA Costs

This ICR renewal includes a cost estimate for the administration of the LBP and RRP programs by the Agency. Exhibit 6.19 presents the average annual total costs to EPA from this information collection. The per-activity burdens are taken from those derived in EPA's (2009) *Economic Analysis for the TSCA Section 402 Lead-Based Paint Program Accreditation and Certification Fee Rule*.⁴ The labor costs are estimated by applying the labor burdens shown in Exhibit 6.19 by \$43.25, \$26.30, \$61.65, and \$46.75 for EPA Region professional, EPA Region clerical, and EPA Region managerial, and EPA Headquarters professional labor, respectively (See Exhibit 6.9 for a summary of wage rate definitions and sources).

The numbers of events are estimated for each respondent type, and following the previously approved ICR (EPA ICR No. 1715.09), 17 percent of LBP activity events nationwide are estimated to occur in areas administered by EPA. Since about 20 states are projected to obtain authorization to administer the RRP program over the next few years, it is estimated that 60 percent of RRP activity events nationwide will occur in areas administered by EPA Regions during the three year period covered by this ICR renewal. For example, since there are 765 renewal LBP activity training provider accreditations, 69 renewal RRP training provider applications, and 660 occur in areas with authorized programs, 174 (174 = 765 + 69 - 660) are estimated to occur in areas administered by EPA Regions.

Exhibit 6.19: EPA Labor Hours and Cost

Activity	Number of Events ^a	Labor Hours Per Event			Total Labor Hours	Total Labor Cost	Contract Cost Per Event	Total Cost
		Prof.	Cler.	Mgmt.				
EPA Region Labor								
Initial T. Provider Accred.	171	0.03	17.37	0.16	3,003	\$80,027		\$80,027
Renewal T. Provider Accred.	174	0.01	3.66	0.25	682	\$19,506		\$19,506
Initial Firm Certification	35,373	0.05	0.59	0.00	22,639	\$625,377		\$625,377
Renewal Firm Certification	781	0.04	0.74	0.00	609	\$16,551		\$16,551
Initial Individual Certification	2,937	0.07	0.69	0.01	2,261	\$64,000		\$64,000
Renewal Individual Cert.	2,359	0.05	0.81	0.01	2,052	\$56,809		\$56,809
Other Admin. Activities	41,795	0.01	0.01	0.01	1,254	\$54,835		\$54,835
Total EPA Region Labor					32,500			\$917,105
EPA Headquarters Labor								
Headquarters Support	1	4,160	0	0	4,160	\$194,480		\$194,480
Contractor application processing	83,590						\$5.48	\$458,073
Contractor database maintenance	1						\$197,397	\$197,397
Total EPA HQ Labor					4,160			\$849,950
Total EPA Labor					36,660			\$1,767,055

^a The numbers of events are estimated as described above for each respondent type, and following the previously

^a The numbers of events are estimated as described above for each respondent type, and following the previously

⁴ Burdens were rounded to the nearest significant two digits and burdens less than 0.01 were rounded up to 0.01.

approved ICR (EPA ICR No. 1715.09), 17 percent of LBP activity events nationwide are estimated to occur in areas administered by EPA.

6(d) Bottom Line Burden Hours and Cost

The number of respondents, responses, average per-respondent burden, total burden, and total costs are shown in Exhibit 6.20, Exhibit 6.21, Exhibit 6.22, and Exhibit 6.23. The estimates of the numbers of small firms and governments are estimated from the previous ICR renewals and related economic analyses. The average annual paperwork burden is estimated be 3,312,524 hours. The total annual respondent cost for the collection of notification information is estimated to be \$155,901,692. The Agency cost is estimated to average \$3,432,724 per year, as shown in Exhibit 6.24.

Exhibit 6.20: Total Respondent Burden and Cost for Individuals

Respondent Type	Number Respondents	Responses Per Respondent	Number Responses	Average Burden Hours Per Response	Total Burden Hours	Total Cost
Initial Inspector	1,696	1	1,696	1.00	1,696.00	\$61,005.12
Renewal Inspector	1,167	1	1,167	1.00	1,167.00	\$41,976.99
Initial Risk Assessor	5,294	1	5,294	1.00	5,294.00	\$190,425.18
Renewal Risk Assessor	6,312	1	6,312	1.00	6,312.00	\$227,042.64
Initial Supervisor	3,410	1	3,410	1.00	3,410.00	\$163,339.00
Renewal Supervisor	3,212	1	3,212	1.00	3,212.00	\$153,854.80
Initial Worker	6,704	1	6,704	0.50	3,352.00	\$93,856.00
Renewal Worker	2,792	1	2,792	0.50	1,396.00	\$39,088.00
Initial Project Designer	265	1	265	0.50	132.50	\$8,424.35
Renewal Project Designer	316	1	316	0.50	158.00	\$10,045.64
Total	31,168	1	31,168	0.8383438142	26,130	\$989,058

Exhibit 6.21: Total Respondent Burden and Cost for Private Firms

Respondent Type	Number of Small Respondents	Number of Respondents	Responses Per Respondent	Number of Responses	Average Burden Per Response	Total Burden Hours	Total Cost
Reporting Burden							
LBP Training Providers							
Initial Accreditation	829	882	1	882	27.60	24,343.20	\$1,163,054.59
Renewal Accreditation	719	765	1	765	5.40	4,131.00	\$185,367.15
Pre-Notification	1,798	1,912	7	13,384	0.20	2,676.80	\$77,359.52
Re-Notification	1,798	1,912	3	5,736	0.20	1,147.20	\$33,154.08
Post-Notification	1,798	1,912	4	7,648	1.60	12,236.80	\$323,128.00
RRP Training Providers							
Initial Accreditation	76	81	1	81	27.60	2,235.60	\$106,811.14
Pre-Notification	564	600	14	8,400	0.20	1680	\$48,552.00
Re-Notification	564	600	2	1200	0.20	240	\$6,936.00
Post-Notification	564	600	14	8,400	1.60	13,440.00	\$354,900.00
RRP Training Provider Digital Photos	564	600	14	8,400	1.30	10,920.00	\$289,254.00
LBP Activity Firms							
Initial Certification	4,390	4,435	1	4,435	7.50	33,262.50	\$1,594,160.75
Renewal Certification	4,606	4,653	1	4,653	1.50	6,979.50	\$335,248.65
Evaluation reports	13,493	13,632	16	218,112	1.86	405,688.32	\$14,658,042.47
Pre-abatement notifications	13,493	13,632	2	27,264	0.50	13,632.00	\$671,239.68
Abatement re-notifications	2,589	2,616	1	2,616	0.22	575.52	\$29,320.13
Occupant protection plan	13,493	13,632	2	27,264	1.00	27,264.00	\$1,741,624.32
Post-abatement report	13,493	13,632	2	27,264	2.00	54,528.00	\$2,620,070.40
Private RRP Firms							
Initial Certification	55,727	56,301	1	56,301	3.50	197,053.50	\$9,470,954.22
Recordkeeping							
LBP Training Provider	1,893	1,912	1	1,912	0.80	1,529.60	\$39,846.08
RRP Training Provider	594	600	1	600	0.80	480.00	\$12,504.00
LBP Firm Certification.	8,995	9,088	1	9,088	0.01	90.88	\$2,367.42
LBP Firm Reports	13,493	13,632	22	299,904	0.01	2,999.04	\$78,124.99
LBP Firm Re-notifications	2,589	2,616	1	2,616	0.01	26.16	\$681.47
RRP Firm Recordkeeping	309,598	312,785	1	312,785	4.80	1,501,368.00	\$71,915,527.20
Third Party Disclosure: RRP Firm Checklists							
RRP Firm Checklist Owner TH	309,598	312,785	28	8,757,980	0.05	437,899.00	\$21,851,160.10
RRP Firm Checklist Renter TH	309,598	312,785	30	9,383,550	0.05	469,177.50	\$24,350,312.25
RRP Firm Checklist In house/Landlord	37,152	37,534	1	37,534	0.05	1,876.70	\$93,647.33
RRP Firm Checklist COF Owner Contractor	263,158	265,867	1	265,867	0.05	13,293.35	\$663,338.17
RRP Firm Checklist COF Renter Contractor	12,384	12,511	1	12,511	0.05	625.55	\$33,717.15
Overall Private Firm Bottom Line							

<i>Reporting subtotal</i>	325,453	328,929	1.285399	422,805	1.9205874	812,034	\$33,709,177
<i>Recordkeeping subtotal</i>	325,453	328,929	1.9058976	626,905	2.4030653	1,506,494	\$72,049,051
<i>Third party disclosure subtotal</i>	309,598	312,785	59.0099973	18,457,442	0.05	922,872	\$46,992,175
Total	325,453	328,929	59.3050537	19,507,152	0.1661647	3,241,400	\$152,750,403

Exhibit 6.22: Total Respondent Burden and Cost for Government Firms

Respondent Type	Number of Small Respondents	Number of Respondents	Responses Per Respondent	Number of Responses	Average Burden Per Response	Total Burden Hours	Total Cost
Reporting Burden							
Initial Certification	1,375	1,389	1	1,389	3.50	4,861.50	\$233,657.58
Recordkeeping							
RRP Firm Recordkeeping	7,639	7,718	1	7,718	4.80	37,046.40	\$1,774,522.56
Third Party Disclosure: RRP Firm Checklists							
Checklist COF In-house/Landlord	7,639	7,718	8	61,744	0.05	3,087.20	\$154,051.28
Overall Government Firm Bottom Line							
Total	7,639	7,718	9.17997	70,851	0.63507	44,995	\$2,162,231

Exhibit 6.23: Overall Respondent Bottom Line Burden and Cost

Respondent Type	Number of Small Respondents	Number of Respondents	Responses Per Respondent	Number of Responses	Average Burden Per Response	Total Burden Hours	Total Cost
Individuals	n.a.	31,168	1	31,168	0.8383438142	26,130	\$989,058
Private Firms	325,453	328,929	59.3050537	19,507,152	0.1661647	3,241,400	\$152,750,403
Governments	7,639	7,718	9.17997	70,851	0.63507	44,995	\$2,162,231
Total	333,092	367,815	-	19,609,171	-	3,312,524	\$155,901,692

Exhibit 6.24: EPA Labor Hours and Cost

Type	Total Cost
<i>Authorized Programs</i>	<i>\$1,665,669</i>
<i>EPA Regions</i>	<i>\$917,105</i>
<i>EPA HQ</i>	<i>\$849,950</i>
Total EPA	\$3,432,724

6(e) Reasons For Changes in Burden

This information collection combines the burdens from three previously approved ICRs, EPA ICR No. 1715.09, EPA ICR No. 1715.10, and EPA ICR No. 1715.12. The total combined burden from these three previously approved ICRs was 3,804,495 hours. The total burden requested for this ICR is 3,312,524 hours. Note that the pre-renovation education burden for Child Occupied Facilities is no longer accounted for in this ICR, but was included in EPA ICR No. 1715.10. This pre-renovation education burden has been moved from this ICR to the renewal request for the pre-renovation education ICR, EPA ICR No. 1669. The difference between the current burden request and the previously approved requests are due to adjustments in EPA's estimates of the burden. Several adjustments to the estimates were made, including:

- Revisions to the estimated number of respondents based on the number of respondents reporting to EPA for the prior information collection;
- Revisions to the per-activity burden estimates to simplify some assumptions (e.g., rounding a per-activity burden to 0.01 from 0.0083) and to make estimation methods consistent across the three different ICRs (e.g., include envelope costs for all notifications, where not all previously approved ICRs included envelope costs); and
- Burden hours and costs to authorized programs are accounted for as Agency burden rather than respondent burden for this ICR.

The total combined cost burden from these three previously approved ICRs was \$127,139,355. The total cost burden requested for this ICR will be \$155,901,692. The difference between the current cost burden request and the previously approved requests are due only to adjustments in EPA's estimates of the burden. In addition to the adjustments listed above, the wage rates and material costs were revised to reflect 2009 dollars for this information collection request. Exhibit 6.25 presents a comparison of the current and previously approved information collection requests. The primary reasons for the differences are as follows:

- The overall burden for individuals performing LBP activities is higher since more individuals are estimated to apply for certification in the current ICR. This higher estimate is due to an increase in the number of individual applications received by EPA between 2007 and 2009.
- The overall burden for LBP activity training providers is higher for this ICR despite a decrease in the number of training providers. Based on the number of accreditation applications received by EPA between 2007 and 2009, each training provider submits more accreditation applications than previously estimated. This appears to be because training providers are submitting separate applications for separate courses rather than applying for accreditation in multiple courses at one time. The decrease in the number of training providers is due to a decrease in the number of EPA accredited providers over the 2007 to 2009 period.
- The overall burden for RRP training providers is higher for this ICR despite a lower burden estimate per provider. The burden per RRP training provider is lower because all training providers needed to apply for initial accreditation during the previous reporting period which covered the initial implementation of the rule. Most RRP training providers will not need to renew their accreditation during this reporting period. This ICR estimates an increase in the estimated number of accredited RRP training providers.

- The overall burden for LBP firms is lower for this ICR as the effect of a lower burden per firm dominates the effect of the increase in the estimated number of firms. The lower estimated burden per firm is because EPA received substantially fewer notifications per firm between 2007 and 2009 than was estimated for the previous information collection request. Specifically, the average firm during 2007-2009 performed one abatement instead of the 14 abatements estimated in the previously approved ICR.
- The overall burden for private and government RRP firms is lower for this ICR primarily due to a lower burden per firm. The burden per firm is lower because most firms applied for certification at the end of the previous reporting period and will not need to renew it during this reporting period. The number of firms is estimated to be slightly smaller for this reporting period following the related economic analyses, which assumed that the number of firms would decline slightly over time with the size of the pre-1978 housing stock.
- The burden for authorized programs is accounted for along with agency costs in the current ICR, rather than as respondent burden.

Exhibit 6.25: Comparison of Current and Previous Information Collection Request

Respondent Type	Number of Respondents	Burden Per Respondent	Respondent Burden Hours
Previously Approved Information Collection			
LBP Individuals	11,336	0.83	9,420
LBP Training Providers	2,483	1.74	4,322
RRP Training Providers	167	127.88	21,356
LBP Firms	8,466	80.13	678,384
Private RRP Firms	314,074	9.42	2,960,028
Government RRP Firms	7,750	6.92	53,629
Authorized Programs	44	1,877.59	82,614
Total	344,320	11.06	3,809,753
Current Information Collection Request			
LBP Individuals	31,168	0.84	26,130
LBP Training Providers	1,912	24.09	46,065
RRP Training Providers	600	48.95	29,368
LBP Firms	13,632	39.98	545,046
Private RRP Firms	312,785	8.38	2,621,294
Government RRP Firms	7,718	5.83	44,995
Authorized Programs	0	0.00	0
Total	367,815	9.01	3,312,524
Difference In Estimates			
LBP Individuals	19,832	0.01	16,710
LBP Training Providers	-571	22.35	41,743
RRP Training Providers	433	-78.93	8,012
LBP Firms	5,166	-40.15	-133,338
Private RRP Firms	-1,289	-1.04	-338,734
Government RRP Firms	-32	-1.09	-8,634
Authorized Programs	-44	-1877.59	-82,614
Total	23,495	-2.05	-497,229

6(f) Burden Statement

The annual public burden for this collection of information, which is approved under OMB Control No. 2070-0155, is estimated to average 0.8 hours for individuals, 9.9 hours for firms, and 5.8 hours for governments (calculated from the number of respondents and total hour burden presented in Exhibit 6.23). According to the Paperwork Reduction Act, “burden” means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. For this collection it includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA’s regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA-HQ-OPPT-2010-1007, which is available for online viewing at www.regulations.gov, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques.

Submit your comments, referencing Docket ID No. EPA-HQ-OPPT-2010-1007 and OMB Control No. 2070-0155, to (1) EPA online using www.regulations.gov (our preferred method), or by mail to: Document Control Office (DCO), Office of Pollution Prevention and Toxics (OPPT), Environmental Protection Agency, Mail Code: 7407T, 1200 Pennsylvania Ave., NW, Washington, D.C. 20460, and (2) OMB by mail to: Office of Information and Regulatory Affairs, Office of Management and Budget (OMB), Attention: Desk Officer for EPA, 725 17th Street, NW, Washington, DC 20503.